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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

MARK WILSON,

Plaintiff,

v.

JERRY PLANTE, RONNIE FOSS, CRAIG
PRINS, JOSH HIGHBERGER, MELISSA
NOFZIGER, COLETTE PETERS, MARIA D.
GARCIA and JOHN DOES 1-10,

Defendants.

Case No. 6:21-cv-01606-SI

DEFENDANTS' UNOPPOSED MOTION TO
DEPOSE PLAINTIFF MARK WILSON

Fed. R. Civ. P. 30(a)(2)(B)

LR 7-1 CERTIFICATE OF CONFERRAL

Defense counsel certifies that they have conferred with plaintiff's counsel, and plaintiff
does not oppose this motion.

MOTION FOR LEAVE TO DEPOSE INMATE

Defendants seek an order allowing the deposition of plaintiff, Oregon Department of
Corrections (ODOC) Adult in Custody Mark Wilson (SID #7449142).

Mr. Wilson is presently incarcerated at Oregon State Correctional Institution (OSCI) in Salem, Oregon.

Defendants seek leave of the Court under Federal Rule of Civil Procedure 30(a)(2)(B) to allow defense counsel to take the deposition of Mr. Wilson. Defendants intend to schedule the deposition for a time and date that is agreeable to Mr. Wilson, Mr. Wilson's counsel, OSCI, and defense counsel. The deposition will be taken before a certified court reporter. In the event of cancellation, the deposition will be rescheduled for a later date and time convenient to the parties.

This motion is supported by the declaration of Shannon Vincent.

DATED August 29, 2022.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Shannon M. Vincent

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